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**ANNUAL AUDITED REPORT
FORM X-17A-5
PART III**

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**Information Required of Brokers and Dealers Pursuant to Section 17 of the
Securities Exchange Act of 1934 and Rule 17a-5 Thereunder**

REPORT FOR THE PERIOD BEGINNING 01/01/2018 AND ENDING 12/31/2018
MM/DD/YY MM/DD/YY

A. REGISTRANT IDENTIFICATION

NAME OF BROKER-DEALER: TJ Bender & Company, Inc.

ADDRESS OF PRINCIPAL PLACE OF BUSINESS: (Do not use P.O. Box No.)

1380 West Paces Ferry Road Suite 2195

(No. and Street)

Atlanta

Georgia

30327

(City)

(State)

(Zip Code)

NAME AND TELEPHONE NUMBER OF PERSON TO CONTACT IN REGARD TO THIS REPORT

Theodore J. Bender, III

404-861-1030

(Area Code - Telephone Number)

B. ACCOUNTANT IDENTIFICATION

INDEPENDENT PUBLIC ACCOUNTANT whose opinion is contained in this Report*

Rubio CPA, PC

(Name - if individual, state last, first, middle name)

2727 Paces Ferry Road SE, Suite 2-1680 Atlanta

Georgia

30339

(Address)

(City)

(State)

(Zip Code)

CHECK ONE:



Certified Public Accountant



Public Accountant



Accountant not resident in United States or any of its possessions.

FOR OFFICIAL USE ONLY

*Claims for exemption from the requirement that the annual report be covered by the opinion of an independent public accountant must be supported by a statement of facts and circumstances relied on as the basis for the exemption. See Section 240.17a-5(e)(2)

SEC 1410 (11-05)

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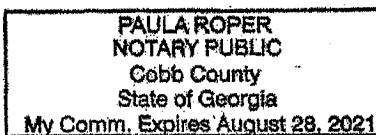
OATH OR AFFIRMATION

I, Theodore J. Bender, III, swear (or affirm) that, to the best of my knowledge and belief the accompanying financial statement and supporting schedules pertaining to the firm of TJ Bender & Company, Inc., as of December 31, 20 19, are true and correct. I further swear (or affirm) that neither the company nor any partner, proprietor, principal officer or director has any proprietary interest in any account classified solely as that of a customer, except as follows:

T J Bender
Signature
Managing Director
Title

Paula Roper

Notary Public



This report ** contains (check all applicable boxes):

- ☒ (a) Facing Page.
- ☒ (b) Statement of Financial Condition.
- ☒ (c) Statement of Income (Loss) or, if there is other comprehensive income in the period(s) presented, a Statement of Comprehensive Income (as defined in §210.1-02 of Regulation S-X).
- ☒ (d) Statement of Changes in Financial Condition.
- ☒ (e) Statement of Changes in Stockholders' Equity or Partners' or Sole Proprietors' Capital.
- ☒ (f) Statement of Changes in Liabilities Subordinated to Claims of Creditors.
- ☒ (g) Computation of Net Capital.
- ☒ (h) Computation for Determination of Reserve Requirements Pursuant to Rule 15c3-3.
- ☒ (i) Information Relating to the Possession or Control Requirements Under Rule 15c3-3.
- ☐ (j) A Reconciliation, including appropriate explanation of the Computation of Net Capital Under Rule 15c3-1 and the Computation for Determination of the Reserve Requirements Under Exhibit A of Rule 15c3-3.
- ☐ (k) A Reconciliation between the audited and unaudited Statements of Financial Condition with respect to methods of consolidation.
- ☒ (l) An Oath or Affirmation.
- ☒ (m) A copy of the SIPC Supplemental Report.
- ☐ (n) A report describing any material inadequacies found to exist or found to have existed since the date of the previous audit.

**For conditions of confidential treatment of certain portions of this filing, see section 240.17a-5(e)(3).

**TJ BENDER & COMPANY,
INC.**

**Financial Statements with
Report of Independent
Registered Public Accounting
Firm**

**For the Year Ended
December 31, 2018**

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RUBIO CPA, PC

CERTIFIED PUBLIC ACCOUNTANTS

2727 Paces Ferry Road SE
Building 2, Suite 1680
Atlanta, GA 30339
Office: 770 690-8995
Fax: 770 838-7123

REPORT OF INDEPENDENT REGISTERED PUBLIC ACCOUNTING FIRM

To the Member of
TJ Bender & Company, Inc.

Opinion on the Financial Statements

We have audited the accompanying statement of financial condition of TJ Bender & Company, Inc. (the "Company") as of December 31, 2018, the related statements of operations, changes in member's equity, and cash flows for the year then ended and the related notes (collectively referred to as the "financial statements"). In our opinion, the financial statements present fairly, in all material respects, the financial position of the Company as of December 31, 2018, and the results of its operations and its cash flows for the year then ended in conformity with accounting principles generally accepted in the United States of America.

Basis for Opinion

These financial statements are the responsibility of the Company's management. Our responsibility is to express an opinion on the Company's financial statements based on our audit. We are a public accounting firm registered with the Public Company Accounting Oversight Board (United States) ("PCAOB") and are required to be independent with respect to the Company in accordance with the U.S. federal securities laws and the applicable rules and regulations of the Securities and Exchange Commission and the PCAOB.

We conducted our audit in accordance with the standards of the PCAOB. Those standards require that we plan and perform the audit to obtain reasonable assurance about whether the financial statements are free of material misstatement, whether due to error or fraud. The Company is not required to have, nor were we engaged to perform, an audit of its internal control over financial reporting. As part of our audit we are required to obtain an understanding of internal control over financial reporting but not for the purpose of expressing an opinion on the effectiveness of the Company's internal control over financial reporting. Accordingly, we express no such opinion.

Our audit included performing procedures to assess the risks of material misstatement to the financial statements, whether due to error or fraud, and performing procedures that respond to those risks. Such procedures included examining, on a test basis, evidence regarding the amounts and disclosures in the financial statements. Our audit also included evaluating the accounting principles used and significant estimates made by management, as well as evaluating the overall presentation of the financial statements. We believe that our audit provides a reasonable basis of our opinion.

Supplemental Information

The information contained in Schedules I and II has been subjected to audit procedures performed in conjunction with the audit of the Company's financial statements. The supplemental information is the responsibility of the Company's management. Our audit procedures included determining whether the information in Schedules I and II reconciles to the financial statements or the underlying accounting and other records, as applicable, and performing procedures to test the completeness and accuracy of the information presented in the accompanying schedules. In forming our opinion on the accompanying

schedules, we evaluated whether the supplemental information, including its form and content, is presented in conformity with 17 C.F.R. §240.17a-5. In our opinion, the aforementioned supplemental information is fairly stated, in all material respects, in relation to the financial statements as a whole.

We have served as the Company's auditor since 2019.

March 4, 2019
Atlanta, Georgia

A handwritten signature in black ink, appearing to read "Rubio CPA, PC", written in a cursive style.

Rubio CPA, PC

TJ BENDER & COMPANY
STATEMENT OF FINANCIAL CONDITION
December 31, 2018

Assets

Assets	
Prepaid Expenses	\$ 10,555
Office Equipment (less accumulated depreciation of \$381)	\$ 3,433
Leasehold Improvements (less accumulated depreciation of \$486)	<u>\$ 3,014</u>
Total Assets	<u><u>\$ 17,002</u></u>

Liabilities and Member's Equity

Liabilities	
Cash	\$ 500
Accounts Payable	<u>\$ 2,224</u>
Total Liabilities	\$ 2,724
Member's Equity	<u>\$ 14,278</u>
Total Liabilities and Member's Equity	<u><u>\$ 17,002</u></u>

See accompanying notes.

TJ BENDER & COMPANY
STATEMENT OF OPERATIONS
FOR THE YEAR ENDED DECEMBER 31, 2018

Revenue	
Retainer Fees	\$ 21,000
Reimbursements	<u>\$ 2,512</u>
Total Revenue	<u>\$ 23,512</u>
Operating Expenses	
Occupancy	\$ 36,818
Technology, Data and Communications	\$ 9,384
Other Expenses	<u>\$ 107,905</u>
Total Operating Expenses	<u>\$ 154,107</u>
Net Loss	<u><u>\$ (130,595)</u></u>

See accompanying notes.

TJ BENDER & COMPANY
STATEMENT OF CHANGES IN MEMBERS EQUITY
FOR THE YEAR ENDED DECEMBER 31, 2018

Balance, January 1, 2018	\$ -
Capital Distributions	\$ (11,972)
Capital Contributions	\$ 156,845
Net Loss	<u>\$ (130,595)</u>
Balance, December 31, 2018	<u><u>\$ 14,278</u></u>

See accompanying notes.

TJ BENDER & COMPANY
STATEMENT OF CASH FLOWS
FOR THE YEAR ENDED DECEMBER 31, 2018

Cash Flows from Operating Activities:

Net Loss	
Adjustments to reconcile net loss to net cash used by operating activities:	\$ (130,595)
Changes in assets and liabilities:	
Prepaid Expenses	\$ (10,555)
Depreciation	\$ 868
Accounts Payable	\$ 2,224
Net cash used by operating activities:	\$ (138,058)

Cash Flows from Investing Activities:

Fixed Assets (Office Equipment & Leasehold Improvements)	\$ (7,315)
Net cash used by investing activities:	\$ (7,315)

Cash Flows from Financing Activities:

Capital Contributions	\$ 156,845
Capital Distributions	\$ (11,972)
Net cash provided by financing activities:	\$ 144,873

NET DECREASE IN CASH

\$ (500)

Cash as of January 1, 2018

\$ -

Cash as of December 31, 2018

\$ (500)

See accompanying notes.

TJ BENDER & COMPANY, INC.
NOTES TO FINANCIAL STATEMENTS
December 31, 2018

Description of Business

TJ Bender & Company, Inc. (the "Company") was organized in the State of Georgia on August 4, 2017. The Company was approved for membership as a broker-dealer with FINRA and with the Securities & Exchange Commission on April 10, 2018. The Company was organized to provide mergers and acquisitions advisory services and raise capital as private placement agent. TJ Bender & Company, Inc. is 100% owned by Theodore J. Bender, III.

Basis of Accounting

The books of the Company are maintained on the accrual basis of accounting, whereby revenues are recognized when they are earned and expenses are recognized when they are incurred.

Use of Estimates

Management uses estimates and assumptions in preparing these financial statements in accordance with accounting principles generally accepted in the United States of America. Those estimates and assumptions affect the reported amounts of assets and liabilities, the disclosure of contingent assets and liabilities, and reported revenues and expenses. Actual results could vary from the estimates that were used.

Cash

The Company maintains its cash deposit at a high credit quality financial institution. Balances at times may exceed federally insured limits.

Revenue Recognition

The Financial Accounting Standards Board (FASB), has issued a comprehensive new revenue recognition standard that supersedes most existing revenue recognition guidance under GAAP. (FASB Accounting Standards Codification 606). The Company adopted this standard effective January 1, 2018.

The standard's core principle is that an entity should recognize revenue when it transfers promised goods or services to customers in an amount that reflects the consideration to which the entity expects to be entitled in exchange for those goods or services. ASU 2014-09 prescribes a five-step process to accomplish this core principle, including:

- Identification of the contract with the customer;
- Identification of the performance obligation(s) under the contract;
- Determination of transaction price;
- Allocation of the transaction price to the identified performance obligation(s); and
- Recognition of revenue as (or when) an entity satisfies the identified performance obligation(s).

The Company recognizes success fee revenue upon completion of a success fee-based transaction. In addition, retainer revenue is recognized when the Company satisfies performance obligations by transferring the promised services to its customers. The Company's performance obligations are satisfied at a point in time when the Company has determined that the customer obtains control over the promised services. The amount of retainer revenue recognized upon the fulfillment of the aforementioned performance obligations without the consummation of a success fee-based transaction was \$21,000 as depicted on the accompanying statement of operation. Application of the standard in 2018 using the modified retrospective approach had no effect on reported financial position, results of operations or related disclosures.

Income Taxes

The Company's loss is reported on the owner's tax return. The Company is a Subchapter S corporation.. Management does not believe there are any uncertain tax positions as defined by FASB Accounting Standards Codification (ASC) Accounting for Income.

Factors Affecting Operations

For the year ending December 31, 2018, the Company earned nominal revenue and has incurred a net loss and negative cash flows from operating activities.

To ensure the Company has sufficient net capital and cash flow to maintain operations, the Company will need to generate revenue and/or obtain additional capital contributions in the calendar year 2019. Failure to receive additional capital or generate revenue will result in the Company's inability to continue as a broker-dealer. Theodore J. Bender, III has represented that he remains committed to funding TJ Bender & Company, Inc. as needed to ensure the Company's ability to remain a going concern through at least March 2020.

Subsequent Events

Subsequent events were evaluated through the date of the financial statements were issued. Management has performed an evaluation of events that have occurred subsequent to the financial statement being issued.

Net Capital Requirement

The Company is subject to the SEC's Uniform Net Capital Rule 15c3-1 ("Net Capital Rule"). Under the Net Capital Rule, the Company is required to maintain minimum net capital of the greater of 12 1/2% of aggregate indebtedness, as defined, or \$5,000. In addition, the ratio of aggregate indebtedness to net capital, both as defined, shall not exceed 8 to 1.

At December 31, 2018, the Company had net capital of (\$2,724), which was below the minimum net capital requirement of \$5,000. The Company's net capital deficit as of December 31, 2018 was (\$7,724). The Company's ratio of aggregate indebtedness to net capital, both as defined, was 1.0 to 1.0.

On January 2, 2019, Theodore J. Bender, III contributed \$25,000 to the Company. The Company believes that it became compliant with its net capital requirements on January 2, 2019.

Contingencies

The Company is not subject to any contingent liabilities. The Company is not subject to any lawsuits, arbitrations, or other legal matters at December 31, 2018

TJ BENDER & COMPANY, INC.
SCHEDULE I
COMPUTATION OF NET CAPITAL PURSUANT TO RULE 15C3-1
OF THE SECURITIES AND EXCHANGE COMMISSION ACT OF 1934
FOR THE YEAR ENDED DECEMBER 31, 2018

Computation of Net Capital

Total Member's Equity	<u>\$ 14,278</u>
Deduction for Non-Allowable Assets	
Prepaid Expenses	\$ 10,555
Fixed Assets	<u>\$ 6,447</u>
Net Capital	<u><u>\$ (2,724)</u></u>
Aggregate Indebtedness	
Liabilities	<u>\$ 2,724</u>
Minimum Net Capital Requirement	
Net Capital Deficit	\$ (2,724)
Minimum Net Capital To Be Maintained	<u>\$ 5,000</u>
(Greater of \$5,000 or 6 2/3% of Total Aggregate Indebtedness)	
Net Capital Deficit	<u><u>\$ (7,724)</u></u>
Percentage of Aggregate Indebtedness to Net Capital	-100%

RECONCILIATION WITH COMPAN'S COMPUTATION OF NET CAPITAL INCLUDED IN PART IIA OF FORM X-17A-5 AS OF DECEMBER 31, 2018.

There is no material difference between the preceding computation and the Company's net capital reported in the Part IIA of the amended unaudited X-17A-5 as of December 31, 2018.

TJ BENDER & COMPANY, INC.
SCHEDULE II
OTHER INFORMATION
FOR THE YEAR ENDED DECEMBER 31, 2018

**A) STATEMENT OF CHANGES IN LIABILITIES
SUBORDINATED TO CLAIMS OF CREDITORS
FOR THE YEAR ENDED DECEMBER 31, 2018**

The Company has not had any subordinated liabilities.

**B) COMPUTATION FOR DETERMINATION OF RESERVE REQUIREMENTS
UNDER SEC RULE 15C3-3 OF THE SECURITIES AND EXCHANGE COMMISSION
AS OF DECEMBER 31, 2018**

The Company is exempt from the provisions of Rule 15c3-3 under the Securities Exchange Act of 1934, pursuant to paragraph (k)(2)(i) of the rule.

**C) INFORMATION RELATING TO THE POSSESSION OR CONTROL REQUIREMENTS
UNDER SEC RULE 15C3-3 OF THE SECURITIES AND EXCHANGE COMMISSION
AS OF DECEMBER 31, 2018**

The Company is exempt from the provisions of Rule 15c3-3 under the Securities Exchange Act of 1934,

RUBIO CPA, PC

CERTIFIED PUBLIC ACCOUNTANTS

2727 Paces Ferry Road SE
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Atlanta, GA 30339
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REPORT OF INDEPENDENT REGISTERED PUBLIC ACCOUNTING FIRM

To the Member of
TJ Bender & Company, Inc.

We have reviewed management's statements, included in the accompanying Broker Dealers Annual Exemption Report in which (1) TJ Bender & Company, Inc. identified the following provisions of 17 C.F.R. § 15c3-3(k) under which TJ Bender & Company, Inc. claimed an exemption from 17 C.F.R. § 240.15c3-3: (k)(2)(i) (the "exemption provisions"); and, (2) TJ Bender & Company, Inc. stated that TJ Bender & Company, Inc. met the identified exemption provisions throughout the most recent fiscal year without exception. TJ Bender & Company, Inc.'s management is responsible for compliance with the exemption provisions and its statements.

Our review was conducted in accordance with the standards of the Public Company Accounting Oversight Board (United States) and, accordingly, included inquiries and other required procedures to obtain evidence about TJ Bender & Company, Inc.'s compliance with the exemption provisions. A review is substantially less in scope than an examination, the objective of which is the expression of an opinion on management's statements. Accordingly, we do not express such an opinion.

Based on our review, we are not aware of any material modifications that should be made to management's statements referred to above for them to be fairly stated, in all material respects, based on the provisions set forth in paragraph (k)(2)(i), of Rule 15c3-3 under the Securities Exchange Act of 1934.

March 4, 2019
Atlanta, GA

Rubio CPA, PC

Rubio CPA, PC

TJ BENDER & COMPANY, INC.
SEC Rule 15c3-3 Exemption

TJ Bender & Company, Inc. (the Company) claims only one exemption from SEC Rule 15c3-3 for the fiscal year ending December 2018. The Company is exempt from the requirements of SEC Rule 15c3-3 ("Customer Protection Rule") under subparagraph (k)(2)(i).

There are three types of exemptions to SEC Rule 15c3-3: (k)(1), (k)(2)(i), and (k)(2)(ii). The firm is unable to avail itself to the (k)(2)(ii) exemption as it applies to introducing broker-dealers who have a clearing relationship and do not hold customer funds or securities. The firm does not maintain a clearing relationship.

The Company is exempt under (k)(2)(i) for the following reasons. 1) The firm requested and was granted such exemption in its Membership Agreement with FINRA. 2) The firm does not hold customer funds or securities, in fact does not receive any customer funds or securities. 3) Any transmittal of any funds by a customer would be handled through a bank account in which the firm is not an owner or beneficiary. 4) The firm carries no margin accounts.

The Company met the identified provision throughout the most recent fiscal year without exception.

I, Theodore J. Bender, III, swear and affirm that, to my best knowledge and belief, this exemption report is true and correct.



Theodore J. Bender, III
CFO